

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois	:	
	:	
Petition for a Certificate of Public Convenience	:	
and Necessity, pursuant to Section 8-406.1 of	:	
the Illinois Public Utilities Act, and an Order	:	
pursuant to Section 8-503 of the Public Utilities	:	No. 12-0598
Act, to Construct, Operate and Maintain a New	:	
High Voltage Electric Service Line and Related	:	
Facilities in the Counties of Adams, Brown, Cass,	:	
Champaign, Christian, Clark, Coles, Edgar,	:	
Fulton, Macon, Montgomery, Morgan, Moultrie,	:	
Pike, Sangamon, Schuyler, Scott, and Shelby,	:	
Illinois.	:	

MOULTRIE COUNTY PROPERTY OWNERS
APPLICATION FOR REHEARING OF SECOND ORDER ON REHEARING

The Moultrie County Property Owners (“MCPO”)¹, pursuant to Section 10-113 of the Illinois Public Utilities Act (220 ILCS 5/10-113), and Section 200.880 of the Illinois Commerce Commission (“Commission”) Rules of Practice, (83 Ill. Adm. Code 200.880) and other applicable law, submit this Application for Rehearing (“Application”) of selected portions of the Commission’s Second Order on Rehearing, issued on February 20, 2014, (the “February 20 Order”) and served on the parties on February 21, 2014.²

¹ Dale Crawford, Roger J. Roney, Phil Martin, Timothy Singer, Cindy L. Harshman, Greg R. Sanders, and Moultrie County Property Owners, Inc.

² The Commission entered its original order in this proceeding on August 20, 2013 (the “August 20 Order”).

In particular, MCPO seeks rehearing on the Commission's routing approval for the Mt. Zion to Kansas routing segment of the Ameren Illinois Transmission Company's ("ATXI") Illinois River Project ("IRP") as approved by the Commission in the February 20 Order. (*See*, February 20 Order at 76-79). Specifically, this Application addresses the February 20 Order's adoption of the Piatt, Douglas, Moultrie County Property Owners' and the Channon Family Trust ("PDM/CFT"), as modified by the Staff, ("Modified Route"), that MCPO respectfully submits is unlawful, not supported by substantial evidence based on the entire record, and is against the manifest weight of the evidence and fails to contain findings that would allow informed judicial review. If not changed, it would constitute reversible error.

ARGUMENT

I. COMMISSION FINDINGS

1. The Commission's February 20 Order contains insufficient, contradictory and confusing findings with regard to its ultimate conclusion as to the preferability of the Modified Route, thereby precluding effective judicial review.

2. With regard to the routing factor "Number of Affected Landowners and Stakeholders", in the January 20 Order, the Commission initially concludes that it is "Unable to Find, Based on the Evidence Presented, that either Route is Preferable." (February 20 Order at 78). In the next paragraph, however, with regard to the routing factor criterion "Presence of Existing Corridors," the Commission finds the Modified Route to be preferable on this routing factor, in part because it "affects fewer property owners." (*Id.*). The Commission then reaches its ultimate conclusion that the Modified Route is preferable in part because it "affects fewer property owners" and "appears to

better utilize existing corridors.” (February 20 Order at 79). The Commission cannot logically or lawfully determine on the one hand that the evidence will not allow it to determine which route is preferable based on the number of affected landowners and on the other hand determine that the Modified Route is preferable because it affects fewer landowners. Nor can the Commission logically or lawfully further support its ultimate conclusion on the preferable route based on the “existing corridors” factor, which incorporates the same contradictory and illogical analysis. Such findings are deficient in that they are conflicting and unexplained and they will not allow informed judicial review.

3. On page 77 of the February 20 Order, the Commission concludes that, based on the evidence in the record, there appears to be no real difference between the routes as to the routing factor criterion “Difficulty and Cost of Operation and Maintenance”. In making its ultimate determination as to the preferable route, however, the Commission then concludes that the Modified Route is preferable in part because it presents no difficulties in construction or maintenance. (February 20 Order at 79). The Commission cannot, on the one hand, find that no route is preferable under the Difficulty and Cost of Operation and Maintenance routing factor criterion and, on the other hand, find that the Modified Route is preferable under the maintenance criterion. Such findings are deficient in that they are conflicting and unexplained and they will not allow informed judicial review.

4. In its Original Order of August 20, 2013 the Commission concluded, as it did on page 77 of the February 20 Order, that the MCPO Route and the ATXI Primary and Alternate Routes did not vary significantly from one another in regard to the difficulties associated with operation and

maintenance. (August 20 Order at 98). On rehearing, without any material change in the evidence, the Commission ultimately finds the Modified Route, which is in part a combination of the ATXI Primary and Alternate Routes from Mt. Zion to Kansas, is preferable under the maintenance criterion. (February 20 Order at 79). This finding is deficient. It will not allow informed judicial review in that the Commission does not explain how or why its finding on this criterion is different from the August 20 2013 finding or the finding in the February 20 Order, that there was no material difference between the routes on this criterion without any significant changes in the evidence upon which the findings were based.

5. In the February 20 Order, the Commission finds that there is little difference between the MCPO Route and the Modified Route with regard to “Visual Impact”, even though the MCPO Route was longer, because “a portion of the extra length will parallel existing transmission lines, thereby mitigating some of the visual impact from the extra length.” (February 20 Order at 77). However, in its original August 20, 2013 Order the Commission found that the “Visual Impact” criterion favored the MCPO Route because it paralleled an existing transmission line. (August 20 Order at 99-100). The Commission noted that the MCPO Route paralleled an existing transmission line for one-quarter of its length and that the existing transmission line was the most similar linear feature to the IRP 345 kV transmission line. The Commission observed that the record did not reflect the existence of any similar linear features on either the ATXI Primary or Alternate Route from Mt. Zion to Kansas. (*Id.*).³ Furthermore, in the August 20 Order, the Commission observed that the MCPO

³ The original PDM/CFT Route combines the western portion of the ATXI Primary Route through Moultrie County and the eastern portion of the ATXI Alternate Route through Coles

Route was the longest of any of the routes under consideration. (August 20 Order at 98).

On rehearing, the MCPO Route is still the longest route under consideration, (*See*, February 20 Order at 54) and still parallels existing transmission lines for 14.7 miles (or almost 20% of its length. (MCPO Ex. 2.3 (Reh.)). The record on rehearing fails to show any similar linear feature along the Modified Route. Yet, the Commission does not find in the February 20 Order, as it did in the August 20 Order, that the MCPO Route is the preferred route under the “Visual Impact” criteria. This finding is deficient. It will not allow informed judicial review in that the Commission does not explain how or why its finding on this criterion is different from the August 20, 2013, finding without any significant changes in the evidence upon which the finding was based.

II. FAILURE TO COMPLY WITH STANDARD FOR REVIEW OF PROPOSED ROUTES AND VIOLATION OF DUE PROCESS

1. The Commission’s approval of the Modified Route is inconsistent with and in violation of the Commission’s own standard for review and assessment of the transmission line routing segments for the IRP and violates the due process rights of parties, including MCPO.

2. In its original Order, the Commission established its standard for review and evaluation of proposed routes for the IRP transmission line under Section 8-406.1 of the PUA. (220 ILCS 5/8-406.1). The Commission indicated that Section 8-406.1(f)(1) of the PUA required that “any project proposed thereunder . . . be the least-cost means of satisfying the identified objectives.” (August 20 Order at 14). The Commission determined that resolving the question of whether a particular route was least-cost, as required by Section 8-406.1, involved “a comprehensive consideration and

County to Kansas. (February 20 Order at 51).

balancing of the overall costs and externalities of each proposed route against the benefits of each proposed route.” The Commission observed that it had used 12 criteria for the purpose of evaluating transmission routes. It identified the 12 criteria. (August 20 Order at 13-14). The Commission concluded that in order to meet its obligations under Section 8-406.1, it would have to evaluate the proposed routes on the basis of these 12 criteria and any other relevant criteria proposed by the parties. (*Id.*). The Commission, in its procedural orders in this case also took great pains to ensure that parties identified their recommended routes well in advance of filing direct testimony. (*See, e.g.*, ALJ Ruling of December 14, 2012 - Case Management Plan at 4, requiring identification of route prior to filing direct testimony and the provision of testimony on that route as part of parties direct testimony). The Commission also expressed concern about the ability of parties to “anticipate, identify and address the many facets” inherent in a project of the size of the IRP. (August 20 Order at 7). The Commission did not apply this standard to its decision to adopt the Modified Route.

3. The Staff indicated in its Direct Testimony on Rehearing that it would make a recommendation as to the appropriate route for the Mt. Zion to Kansas segment in its Rebuttal Testimony. (Rockrohr, Staff Ex. 2.0 at 15). Staff did not do so. The Modified Route the Commission chose was first presented and analyzed by Staff in its Surrebuttal Testimony on Rehearing. (Rockrohr, Staff Ex. 4.0 at 12-18). Moreover, Staff did not recommend this route and in its routing analysis only addressed 5 of the 12 routing factors the Commission identified, indicating it was not aware of differences among the routes with regard to the other factors. (*Id.*) Thus no party had an opportunity to respond with testimony with regard to any impacts of Staff’s modification on the overall routing analysis or to Staff’s routing analysis itself, either with regard

to the routing factors the Staff did analyze or those for which Staff claimed it was not aware of any differences. Furthermore, the Commission chose a Staff modified route which the Staff itself did not recommend. The Route Staff actually recommended in its Surrebuttal Testimony on Rehearing was the ATXI/MCPO route, (referenced here as the MCPO Route).

Because there was not opportunity for any party to respond through testimony to Staff's routing factor analysis with regard to the Modified Route the Commission actually chose, the Commission could not, and did not, engage in a comprehensive review or analysis of the Modified Route in comparison to other routes, or give comprehensive consideration to, and make a balance of, costs and externalities associated with the Modified Route against the benefits of the route, as required by Section 8-406.1. The Commission violated its own procedures and standards for route proposals under Section 8-406.1, thereby violating the Act and the due process rights of the parties. Furthermore, basing its decision on a route modified and analyzed by Staff for the first time in surrebuttal testimony, to which no party had the opportunity to reply, also violated the due process rights of the parties, including MCPO.

III. THE COMMISSION'S FEBRUARY 20 ORDER IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE AND IS CONTRARY TO THE MANIFEST WEIGHT OF THE EVIDENCE

1. The Commission's adoption of the Modified Route is not based on or supported by substantial evidence. Neither the Staff, nor PDM/CFT, presented evidence which would allow the Commission to conduct a comprehensive review or analysis of the Modified Route under the standard of review established by the Commission under Section 8-406.1 in the August 20 Order. Therefore, the Commission should grant rehearing.

2. The Commission's routing evaluation for the Mt. Zion to Kansas segment is largely based on the MCPO Route in comparison to the PDM/CFT unmodified route. Other than Criteria No. 1 - Length of the Line; No. 2 - Difficulty and Cost of Construction; No. 8 - Proximity to homes and Other Structures; No. 9 - Proximity to Existing and Planned Developments and No. 12 - Presence of Existing Corridors, the record is devoid of any specific evidence or Commission analysis on routing factors:

- No. 3 - difficulty and cost of operation and maintenance;
- No. 4 - environmental impacts;
- No. 5 - impacts on historical resources;
- No. 6 - social and land use impacts;
- No. 7 - number of affected landowners and other stakeholders;
- No. 10 - community acceptance; or
- No. 11 - visual impact;

relating to the Staff's Modified Route. Therefore, the Commission decision to adopt the Modified Route as the preferred route from Mt. Zion to Kansas is not supported by substantial evidence. Even if the evidence presented is considered substantial, the Staff witness presenting that evidence concluded that the MCPO Route, not the Modified Route, was shown to be the preferred route. Thus, the Commission's adoption of the Modified Route was contra to the evidence presented on the Route by the Staff.

IV. FEBRUARY 20 ORDER CONTAINS FINDINGS THAT ARE CONTRARY TO, AGAINST THE MANIFEST WEIGHT OF THE EVIDENCE OR NOT SUPPORTED BY SUBSTANTIAL EVIDENCE

1. The February 20 Order concludes that “the Commission is unable to find, based on the evidence presented, that either route is preferable when considering . . .” the proximity to homes and other structures. (February 20 Order at 78). In making this finding, the Commission expresses dismay and confusion regarding the evidence on the number of homes and other buildings impacted by the various routes and its apparent belief that all the parties primarily relied on Google maps as the basis for their testimony on these issues. (February 20 Order at 76). The Commission is incorrect. As noted in MCPO’s Brief on Exceptions, neither the ATXI nor MCPO primarily relied on Google maps for their analyses on these issues. Instead, the ATXI/MCPO structure counts on rehearing were based on the updated GIS data and visual inspections performed by ATXI on the MCPO route from Mt. Zion to Kansas and the PDM/CFT route. (MCPO Brief on Exceptions on Rehearing, at 26; Reinecke, MCPO Ex. 2.0 (RH) at 3-4: 87-96; Murphy, ATXI Ex. 3.0 (RH) at 17; Dec. 17, Tr. 150-151). The only party to primarily rely on Google maps was the party whose route the Commission chose, the PDM/CFT route modified by the Commission Staff. Moreover, the Commission has never clearly expressed, either in the February 20 Order or in any other way, the exact nature of, and the practicality or expense of obtaining, the evidence it would minimally require to make a determination on this issue, given the expedited nature of the proceedings as well as the length and complexity of the IRP.

2. The un rebutted and unrefuted record evidence shows that the MCPO Route has no residences within 75 feet; no residences within 150 feet, 5 residences within 300 feet and 12

residences within 500 feet of its centerline. (*See*, MCPO BOE on Reh. at 4, Table 1). The PDM/CFT Route has no residential structures within 0 to 75 feet, 9 residences within 100 to 150 feet, 21 residences within 300 feet and 30-31 residences (depending on which party's analysis is used) within 500 feet of the centerline of the PDM/CFT Route. Likewise, there was no real dispute on the number of non-residential structures impacted by these routes. There was a total of 57 non-residential structures impacted by the MCPO Route and 129 impacted by the PDM/CFT Route. (*Id.* at 5, Table 2). Staff also explained that its analysis of the Modified Route showed that route impacts significantly more residential structures than the MCPO Route. (Rockrohr, Staff Ex. 4.0 (RH) at 15-16). MCPO explained and argued the evidence on the proximity to homes and other structures in its Initial Brief on Rehearing of December 30, 2013, its Reply Brief on Rehearing of January 7, 2014, and its Brief on Exceptions on Rehearing of January 29, 2014. (MCPO Br. on Reh. at 39; MCPO R. Br. on Reh. at 33-43; and MCPO BOE on Reh. at 2-5 and 24-28). It incorporates those arguments and positions herein by reference.

3. The Commission and its Staff have traditionally considered the impact on residential structures to be an important and determinative factor. (*See, Illinois Power Company d/b/a Ameren Illinois*, ICC Dkt. 06-0179, Order, May 16, 2007 at 16-17, where the Commission selected a longer and more costly route because it impacted fewer houses). The Commission refused to consider the undisputed evidence on this issue and refused to make a decision thereon. This renders the Commission's Order, as it relates to the determination that the Modified Route is preferable, arbitrary and capricious in that the Commission failed to consider an important aspect of the route

determination of the Mt. Zion to Kansas segment of the IRP as it relates to the number of homes impacted by the various routes. (*See, Greer v. Illinois Housing Authority*, 122 Ill. 2d 462, 505-506).

4. The February 20 Order determines that the Modified Route is preferable with regard to the Length of Line routing criteria. However, the Commission has overlooked or ignored the substantial evidence that length of line is not appropriately considered a determinative criterion in this case. MCPO addressed this issue in its Initial Brief on Rehearing of December 30, 2013, its Reply Brief on Rehearing of January 7, 2014 and its Brief on Exceptions on Rehearing of January 29, 2014. (MCPO Br. On Reh. at 35; MCPO R. Br. On Reh. at 5-8; MCPO BOE on Reh. at 6-8). MCPO incorporates the arguments made and positions taken in those briefs herein by reference.

5. The February 20 Order finds “that neither route is clearly preferable to the other when considering ‘Environmental Impacts’.” (February 20 Order at 77). The Commission has overlooked or ignored the comprehensive analysis of the environmental impacts of the MCPO Route and the PDM/CFT routes performed by MCPO, which clearly demonstrate that the MCPO Route is the better route when environmental impacts are comprehensively considered. The unrebutted and unrefuted evidence demonstrates that the MCPO Route impacts fewer acres of wooded areas (Reinecke, MCPO Ex. 2.2(RH Rev.) at 3). The PDM/CFT Route impacts 1.2 acres of bird rookeries, while the MCPO Route affects none. The PDM/CFT Route affected more designated Illinois natural areas. (Reinecke, MCPO Ex. 2.2 (RH Rev.) at 3). The PDM/CFT Route had greater wildlife habitat fragmentation than the MCPO Route. (Reinecke, MCPO Ex. 4.0 (RH) at 2-5). The majority of the MCPO Route is actually located within previously disturbed areas, and therefore, has less of an impact on existing minimally disturbed natural areas, compared to the PDM/CFT Route. (Reinecke,

MCPO Ex. 4.0 (RH) at 5-6; MCPO Ex.

4.2 (RH)). PDM/CFT presented evidence that the MCPO Route crosses a grove of walnut trees on a single property owner's property, potentially impacted a forested flood plain and spanned a single claimed archeological site. (*See*, PDM Br. on Reh. at 17). This PDM/CFT evidence does not represent a comprehensive analysis for the environmental impacts of these lines. The Commission's finding on this routing factor is against the manifest weight of the evidence and ignores or overlooks the substantial evidence in favor of the MCPO route on this factor. MCPO has addressed these issues in its Initial Brief on Rehearing, Reply Brief on Rehearing and Brief on Exceptions on Rehearing. (MCPO Br. on Reh. at 36; MCPO R. Br. on Reh. at 16-19; MCPO BOE on Reh. at 15-17). MCPO incorporates those arguments and positions herein by reference.

6. The February 20 Order provides "The Commission is unable to find, based on the evidence presented, that either route is preferable when considering . . ." the "Proximity to Existing Land Development" criterion. (February 20 Order at 78). However, the record shows that the Modified Route is actually about 2.7 miles closer to the Amish community in Arthur, Illinois, than the PDM/CFT unmodified route. (*See*, ATXI Ex. 4.2, Pt. 67 at 2 of 3), the MCPO Route impacts only 64 to 66 acres of developed land compared to 154 to 156 acres of developed land on the PDM/CFT Route. (Reinecke, MCPO Ex. 2.0 (RH) at 5, Table 2, Fn. 3). MCPO explained and argued this issue in its Initial Brief on Rehearing of December 30, 2013, its Reply Brief on Rehearing of January 7, 2014, and its Brief on Exceptions on Rehearing of January 29, 2014. (MCPO Br. on Reh. at 39; MCPO R. Br. on Reh. at 44-46; MCPO BOE on Reh. at 28-30). MCPO incorporates those arguments and positions herein by reference.

7. The February 20 Order concludes that neither the MCPO Route nor the PDM/CFT Route is clearly preferable under the “Community Acceptance” criterion. The record in this case clearly demonstrates that the MCPO Route had overwhelming support of the active participants in this case representing significant geographical diversity. The MCPO Route was supported by the Commission’s own Staff, ATXI, JDL Broadcasting, Tarble Limestone Enterprises, Coles County Landowners, Reed Interests, Coles and Moultrie County Land interests, the Shelby County Landowners Group, Brock-Jones, Cooley, and the Village of Mt. Zion. (*See*, ATXI Br. on Reh. at 37; Staff Br. on Reh. at 20; Brock-Jones Br. on Reh. *generally*; Cooley Br. on Reh. *generally*; ATXI/Village of Mt. Zion Stipulation, ATXI Stip. 1 on Reh.; Stop the Power Lines Coalition, June 3, 2013 Br. at 1-2; Shelby Cty. Landowners, June 13, 2013 Br. at 4). These parties represent interests in Macon County, Moultrie County, Coles County and Shelby County. The Commission’s finding on this factor is contrary to the manifest weight of the evidence which supports the conclusion that the MCPO Route is the better route under the Community Acceptance criterion. MCPO addressed this issue in its Initial Brief on Rehearing of December 30, 2013, its Reply Brief on Rehearing of January 7, 2014 and its Brief on Exceptions on Rehearing of January 29, 2014. (MCPO Br. on Reh. at 39-40; MCPO R. Br. on Reh. at 46-47; MCPO BOE on Reh. at 30-32). MCPO incorporates the arguments made and the positions taken in those briefs herein by reference.

8. The February 20 Order concludes there is “little difference between the routes” with regard to the Visual Impact criterion. (February 20 Order at 77). The February 20 Order overlooks or ignores that in the August 20, 2013 Order, the Commission found this criterion favored the MCPO Route because the MCPO Route paralleled an existing transmission line which the Commission

described as a similar linear feature and recognized that paralleling similar linear features mitigated the visual impact of the transmission lines and that the other available routes did not reflect any comparable linear features. (August 20 Order at 101). Likewise, on rehearing, the record shows that the MCPO Route parallels an existing transmission line and provides a net benefit of approximately 5.4 miles of mitigated visual impact. The Commission's finding on this factor is contrary to the manifest weight of the evidence which supports a conclusion that the MCPO Route is preferable under this factor. MCPO addressed this issue in its Initial Brief on Rehearing of December 30, 2013, its Reply Brief on Rehearing of January 7, 2014 and its Brief on Exceptions on Rehearing of January 29, 2014. (MCPO Br. on Reh. at 40; MCPO R. Br. on Reh. at 48-51; MCPO BOE on Reh. at 32-34). MCPO incorporates the arguments made and the positions taken in those briefs herein by reference.

9. Despite the Commission finding that the MCPO Route paralleled U.S. Highway 36 through a significant portion of its length and paralleled an existing transmission line for about a quarter of its length, the Commission finds that because the PDM/CFT Route is better at paralleling minor roads and section lines (at the expense of impacting more houses), it is the preferred route for the Mt. Zion to Kansas segment. (February 20 Order at 78). This finding is against the manifest weight of the evidence, and ignores or overlooks the substantial evidence in favor of the MCPO Route with regard to this routing criterion.

V. MCPO SHOULD BE GIVEN THE OPPORTUNITY TO REPLY TO THE ROUTING PROPOSED BY STAFF MADE IN ITS SURREBUTTAL TESTIMONY

1. The February 20 Order adopts the Modified Route (February 20 Order at 79) which was first presented and analyzed, but not recommended, in Staff's surrebuttal testimony. (*See*, Rockrohr, Staff Ex. 4.0 (RH) at 14-17). Staff had indicated in its direct testimony on rehearing that it would recommend a route in its rebuttal testimony, but did not do so, and, as noted above, only presented and analyzed the modified route in its surrebuttal. (*See*, Rockrohr, Staff Ex. 2.0 (RH) at 15 and Ex. 3.0 (RH) *generally*).

2. None of the parties in this case had the opportunity to present any testimony in reply to Staff's analysis and discussion of the Modified Route. MCPO would have presented testimony relating to the twelve routing criteria used by the Commission to evaluate the transmission routing proposals in this case and any other relevant criteria identified by MCPO in its review of the Modified Route in Staff's surrebuttal analysis. For example, MCPO would have, had it been given the opportunity, been able to provide new facts regarding the number of affected property owners and parcels on the Modified Route in comparison to the MCPO Route, which shows that the number of landowners and parcels affected are approximately the same despite the MCPO Route's greater length. The new facts regarding the affected landowners and parcels along the Modified Route are based upon a review of plat maps from the affected counties and the residential structure counts are based on ground observations. These new facts are shown in the Table below.

			Residences/Centerline				Total
Route	# parcels affected	# landowners affected	300-500 Feet	150-300 Feet	75-150 Feet	0-75 Feet	
MCPO	304	235	7	4	1		12
Modified Rt.	306	240	14	10	12	1	37

In addition, MCPO would show that the Modified Route impacts an additional 15 non-residential structures (or a total of 144) within 500 feet of the Modified Route compared to the 129 non-residential structures on the PDM/CFT unmodified route and that a radio tower is 132 feet from the Modified Route.

CONCLUSION

For all the reasons stated above, the Commission should grant rehearing in this case and allow MCPO to present the additional testimony described herein.

Respectfully submitted,



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STATE OF ILLINOIS :
 :
COUNTY OF MOULTRIE : SS

VERIFICATION

DALE CRAWFORD, being first duly sworn, deposes and says that he is one of the members of the Moultrie County Property Owners ("MCPO"); that he has read the above and foregoing Application for Rehearing, has knowledge of the new facts stated therein and herewith states that the matters set forth therein are true to the best of his information and belief.



Dale Crawford
1595 CR 1575 E
Sullivan, Illinois 61951

SUBSCRIBED AND SWORN TO before me, a Notary Public on this 28th day of March,
2014



NOTARY PUBLIC

80394.1

